

TESTIMONY OF BARB MOORE

**PREPARED FOR THE U.S. DEPARTMENT OF ENERGY
PUBLIC HEARING ON 10/23/90**

**PROPOSED SURFACE WATER INTERIM MEASURES/
INTERIM REMEDIAL ACTION PLAN AND
DECISION DOCUMENT**

903 PAD, MOUND, AND EAST TRENCHES AREAS

OPERABLE UNIT NO.2

ADMIN RECORD

EXHIBIT #5
10/23/90

A-DW02-000067

My name is Barb Moore

I am a Director of the Front Range Alternative Action Group.
I am a Director of the Rocky Flats Cleanup Commission.
I am an affected citizen.

Tonight I speak as as a public citizen.

The first two items I wish to address relates to the execution of this hearing.

1. It continues to be a problem that DOE and EG&G continue to schedule these hearings without giving interested citizens sufficient time to review the documents in question. This problem is not new, we have been through this with the IAG, 881 and now 903. There have been promises made by DOE and EG&G to correct these problems. But we have heard this before it's time for DOE & EG&G to act. It is mandatory that these documents be distributed/mailed As Soon AS Possible after they are issued.

2. Why wasn't there a workshop or study session for this document?

The 903 area is one of the most critical areas targeted for cleanup in the IAG. EG&G & DOE offered this for the 881 Decision Document. This was provided for the PRMP but it was overlooked for 903. Could it be that EG&G & DOE are not prepared to answer the questions that would be asked? Could it be they don't entirely understand all the steps, but only have an educated guess on how the proposed system will work? In the future please provide a work shop when we are dealing with documents that involve this amount of complexity

Now... about the document...

Section 3.3 states you will consider attainment of the Clean Water Act (CWA) water quality criteria where relevant and appropriate. On the next page it states that "It may not be practical to attain all ARARs for this interim action and ARAR waivers or alternate concentration limits may be requested after the study is complete.

The big questions here are:

- Who decides what is relevant and appropriate?
- * Who will issue waivers of the ARARs?
- * Who decides that the study is complete?
- Who will get notified if any of these actions should take place?
- If the DOE is so confident that the water treatment systems described in this IM/IRA will work why did they build into it these escapes?

If the proposed technology described in this plan cannot meet all the standards whether they be CWA, ARARs, State or any other

applicable regulation then DOE needs to go back to the drawing board and come up with a plan that they can guarantee will work. It simply is not good management to spend money on something that won't meet the requirements. Don't build into these documents ambiguous statements about Where relevant and appropriate and waivers of ARARs. It only acts to further reduce your credibility

SECTION 4.3 Describes that the transport of the water from the collection systems to the treatment plant will be done with a tank truck DOE & EG&G propose to truck this poison from all collection points south of the treatment plant. The concern here is the redistribution of soil particulates in the air that are contaminated with plutonium and uranium. Past remediation on this site has caused high levels of plutonium to be found throughout the entire Denver-Metro area

I reference a DOW Chemical report July 9, 1971 page 6 tells us that the quantity of plutonium redistributed was directly associated with removal of the drums, physical activity and the periodic high winds. If you go back and review the data from 1969 you will find the highest readings in 1969 for plutonium in the air occurred during the times of heavy "cleanup activity". It would be foolish to repeat this same mistake.

The plan to transport the collected water with a tanker truck over a public highway to get from one part of the plant to another is absolutely unacceptable. Indiana is a fast highway, in the winter when the winds start blowing it redefines hazardous driving conditions. There is a significant chance for accidents. Why risk this? To save a few bucks? It's not worth it. The transport system for this water needs to be redesigned.

It the water is transported with tanker trucks will EG&G have to notify the Department of Transportation & fill out Waste Haulers Manifest forms? Will the waste haulers be exempt from future litigation should it turn out that the waste water is not handled properly?

Page 7.2 paragraph 2 is the only mention of a Health and Safety Plan. Given the experiences of 881 I would think a Health and Safety plan would warrant its own section. It is neglectful to stuff the HSP in a paragraph that begins talking about dust control. The IAG requires that all contractors and subcontractors be educated on the IAG I did not find any mention of this in this Decision Document Why is it being overlooked?

Page 4-19 says the effectiveness of Surface water collection by diversion, along with implementation of dust suppression procedures during installation should result in a high degree of public acceptance What audacity to assure that the public will endorse this technology. I don't know anyone in the public sector that is

satisfied with the dust suppression at 881. The 903 area has even higher levels of radiation, why would you assume that we would give you our stamp of approval on this so called plan? Perhaps if you tell us enough that we approve of something you may get someone to believe it? Think again!

The cleanup and construction activity must be done under a protective dome of some sort. This would prevent the plutonium contaminated soil from being resuspended in the air prior to filtration.

Page 7-3 In regard to the carbon columns. Will the water be tested for radioactivity prior to entering the columns? It would seem appropriate to have a holding tank of some sort should the water test positive for radiation. That way the columns will not be contaminated with radiation.

It would also seem prudent to construct a small setup in a laboratory to test the proposed technology prior to spending hundreds of thousands of dollars on it.

The last thing I'll have time to comment on is I think that the D.O.E. should instruct EG&G to design a water treatment plant that would be able to treat all the water destined for treatment of some sort. It seems like such a waste of money to construct a water treatment system for each IM/IRA. Wouldn't that be the best use of the money?

There are so many problems with this Decision Document that a person simply cannot discuss them all in the limited amount of time allotted. I would ask that DOE extend the time limit for written comments to allow those who need it more time to review and compile their written comments.